<u>REMARKS</u>

Claims 50-54, 56-63, 65-69, and 72-85 remain in this application, with claims 50, 51, 54 and 60 amended, and claims 74-85 added. Support for the amendments and new claims may be found, among other places, at fig. 5 and corresponding discussion at p. 14:21 – 16:4, and fig. 4 and corresponding discussion at p. 12:12 – 13:4. The amendments do not add new matter, and are made without prejudice to applicant's right to pursue claims of any patentable scope supported by the specification.

A telephone interview was conducted between the examiner and applicant's attorney on March 12, 2008. The rejections in the last office action were discussed to improve mutual understanding of how the references were being applied, and what subject matter might be patentable. It was agreed that the present office action is not final, and any markings on the cover sheet to the contrary should be disregarded. Although no definite agreement was reached concerning how to put the claims in condition for allowance, applicant thanks the examiner for his patience during the interview and respectfully submits the present amendments and new claims in light of the examiner's remarks during the interview and further study of the application and office action.

Claims 50-53, 60-62, 68-69 and 72-23 are rejected under 35 U.S.C. §103(a) as unpatentable over Weinberg et al. (US 6,237,006) in view of Bloomberg (US 5,765,176); Claims 54, 56-58, 63 and 65-67 are rejected under 35 U.S.C. §103(a) over Weinberg, Bloomberg and further in view of Astiz (US 6,035,330); and Claim 59 is rejected under 35 U.S.C. §103(a) as unpatentable over Weinberg, Bloomberg, Astiz, and further in view of Sitka (US 6,330,572). All of these rejections are respectfully traversed, for reasons further explained below.

Claims 50, 60

Weinberg & Bloomberg Fail To Disclose *Generating Map Information* **Configured As Defined By Independent Claims 50 and 60.**

Claim 50 defines:

generating map information regarding the target pages and each set of linked related pages, the map information comprising the block of text, the reduced-size image, **hyperlinks referencing the target pages and each operative for requesting a map of respective ones of the target pages**, and a descriptor of selected pages from each set, for each of the plurality of target pages, **configured such that, when the map information is displayed at a remote client as a map of a target page, the map of the target page contains all of the map information arranged according to the properties of the selected objects** in a user-navigable display that enables user exploration of the selected objects including requesting, using the hyperlinks, additional web maps of target pages.

Claim 50 further defines "**defining properties of the selected objects comprising respective locations of the selected objects on the target pages**." Claim 60 defines similar claim features. Claims 50 and 60 therefore both define features wherein the map information comprises (1) the block of text, (2) the reduced-size image, (3) hyperlinks referencing the target pages and each operative for requesting a map of respective ones of the target pages, and (4) a descriptor of selected pages from each set of target pages. Likewise, both claims define that the map information is configured such that when the map information is displayed at a remote client as a map of a target page, **the map of the target page contains all of the map information arranged according to the properties of the selected objects in a user-navigable display that enables user exploration of the selected objects including requesting, using the hyperlinks, additional web maps of target pages**.

Weinberg plainly lacks these features. Weinberg fails to disclose "**defining properties of the selected objects comprising respective locations of the selected**

objects on the target pages." Weinberg instead discloses only various star or tree maps that display relationships between different web pages. That is, Weinberg maps external relationships between pages, but not locations of selected objects on the target pages. See, e.g., figs. 1-6, 13-16, 18-19, and 21-24. Likewise, Weinberg fails to disclose making use of properties comprising respective locations of the selected objects on the target pages such that **the map of the target page contains all of the map information arranged according to the properties**, i.e., according to the respective locations of the selected objects on the target pages. The star or tree maps of Weinberg do not provide any internal location information for objects inside of a mapped page. Weinberg fails to disclose any use for such location information as defined by claims 50 and 60.

Bloomberg fails to make up for this deficiency of Weinberg. Bloomberg discloses only text "greeking," and Bloomberg is not concerned with mapping a linked Web site or hyperlinked documents. Accordingly, a *prima facie* case under § 103 has not been properly made out against claims 50 and 60. The remaining claims are also allowable, at least as depending from allowable base claims.

<u>Claims 54, 57, 63 & 66</u>

Weinberg, Bloomberg & Astiz Fail To Disclose *Serving The Map Page In Response To Selection Of An Associated Identifier Or Hyperlink*

The deficiencies of Weinberg and Bloomberg with respect to the base claims 50 and 60 are acknowledged, as discussed above in connection with the base claims. The Office Action further acknowledges the deficiencies of Bloomberg and Weinberg with respect to dependent claims 54, 57, 63 and 66. Astiz does not make up for these deficiencies. Astiz is cited for disclosing storing map information in a database, and for use of a mouse to access a web map. Col. 9:31 – 10:50. Astiz fails to disclose or suggest "**serving the map page in response to selection of one of the hyperlinks**

referencing the target pages," as defined by claim 54. Likewise, Astiz fails to disclose or suggest "**serving the map page in response to selection of an associated identifier**," as defined by claim 63. Instead, Astiz discloses:

> the map maker 14 generates a map icon which is automatically displayed by browser 12 whenever the user is browsing that web site. A user displays the web site map by clicking for example on that map icon displayed on the browser display screen.

Col. 9:34-38. This map icon, however is <u>not</u> an identifier because it is not unique to the map page; it just indicates a map-generation command for the current web site, much like a "print" icon indicates a link to print the current document. Nor can is read on a "one of the hyperlinks referencing the target pages." Astiz therefore does not read on claim 54, which requires that a map be served in response to selection of one of the hyperlinks referencing the target pages. Likewise, Astiz cannot read on claim 63, which requires that a map be served in response to selection of its identifier.

Astiz also discloses:

> [t]o go directly to a map entry such as an HTML page, the user simply selects a map entry, e.g., clicks his mouse while pointing to one of the entries in the displayed navigational web site map. In response, the map viewer 18 and browser 12 retrieve the specified HTML page.

Col. 10:45-49. This differs from what is claimed, because the "map entry" of Astiz does not link to a map of the indicated page. Instead, the map entry links to the page itself, just as an ordinary hyperlink. While opening a web page by selecting a link to it may have been "notoriously well known in the art," and is disclosed by Astiz, the novel step of serving a map instead of the web page was apparently not known at all, and may be said to obtain an unexpected result. Astiz therefore does not make up for the deficiencies of Weinberg and Bloomberg in failing to disclose "serving the map page in response to selection of one of the hyperlinks referencing the target pages" or "serving the map page in response to selection of an associated identifier"

Similar considerations apply to claims 57 and 66, which further define operation of a hyperlink as a way to access a map of a related page. This is not disclosed by Astiz. As noted above, Astiz discloses using a hyperlink to access the page itself, but not to access a map of the page. When a page is being viewed, Astiz would provide a map in response to selection of a "map" icon or command. Astiz therefore discloses a fundamentally different scheme for delivering Web maps.

Accordingly, claims 54, 57, 63 and 66 are independently allowable.

Claims 74-85

Weinberg and the other references of record do not bar patentability of claims 74 and 85. Claim 74 defines:

> defining object properties for the objects that exist on the target pages, wherein object **properties for text object types comprise an object location on page, and at least one textual phrase, object properties for graphical object types comprise an object location on page and thumbnail image data for each graphical object and object properties for hyperlink object types comprise an object location on page and an object classification for what each hyperlink object links to, for each hyperlink object**; and
> storing the object properties in the database for generating map pages wherein the object properties are **arranged according to their respective properties of object location on page**

Weinberg fails to disclose defining object properties including location on the mapped page. Instead, Weinberg and the other references of record are concerned with showing relationships between pages, i.e., with mapping external page relationships. These references teach nothing about defining or using map properties including "object location on page."' Similar considerations apply to claim 80, and the remaining claims are also allowable, at least as depending from allowable base claims.

Conclusion

In view of the foregoing, the Applicants respectfully submit that Claims 50-54, 56-63, 65-69 and 72-85 are in condition for allowance. Reconsideration and withdrawal of the rejections is respectfully requested, and a timely Notice of Allowability is solicited.

The arguments for patentability set forth in this response are sufficient for overcoming the pending rejections, and are made without derogation or waiver of other arguments for patentability such as have been or may be advanced regarding the claims at issue. No admission is made of any fact asserted in the office action, nor is any argument conceded, unless expressly done so.

To the extent it would be helpful to placing this application in condition for allowance, the Applicants request the Examiner to contact the undersigned counsel and conduct a telephonic interview.

While no fees are believed due in connection with the filing of this paper, the Commissioner is authorized to charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-3683.

Respectfully submitted,

Date: March 21, 2008   ___/Jonathan Jaech/___
                              Jonathan Jaech
                              Attorney for Applicants
                              Registration No. 41,091

CUSTOMER
NUMBER   **Connolly Bove Lodge & Hutz LLP**
                      P.O. Box 2207
                      Wilmington, DE 19899
58688   (213) 787-2500
PATENT TRADEMARK OFFICE

12324.1